

# EXHIBIT H

28

1 each project there are folders for claimants. Is that  
2 correct?

3 A Correct.

4 Q Okay. So, within the project, the payment  
5 bond file for a particular project, a copy of the bond  
6 would be there; is that correct?

7 A Yes, a copy of the payment and the  
8 performance bond should be with the general file for  
9 each particular project.

10 Q Okay. When you say general file?

11 A Which encompasses the payment bond files,  
12 the, for lack of a better word, performance bond files  
13 which would be files relating to completion of the  
14 project.

15 Q When USF&G took over performance of the  
16 projects from CCI, did it obtain CCI's project files?

17 A I believe it obtained most of them, but I  
18 don't know if we got all of them.

19 Q And where --

20 A I'm sorry, can I clarify that?

21 Q Sure.

1           A       With regard to the projects that we had  
2 open bonds on, I think that CCI had some non-bonded  
3 projects, and I don't believe we got those files.

4           Q       And for those project files that you did  
5 obtain, where are they maintained today?

6           A       It varies with the project. In some  
7 instances, those files were turned over to the  
8 completion contractor that completed the work. In  
9 some instances, they were returned to CCI when the  
10 project was completed.

11                   In some instances, we still have them,  
12 those files either in part here in our offices or with  
13 engineers or consultants that worked with us. So it  
14 varies with the project.

15           Q       But are those files contained within  
16 either the payment bond files or the performance bond  
17 files?

18                   MR. LEVIN: Objection.

19                   THE WITNESS: Geographically the same  
20 location or intellectually is it one file?

21           Q       Let's start with the latter.